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September 24, 2010

Mark Brandsgard, Chief Clerk
Iowa House of Representatives
State Capitol Building

Dear Mr. Brandsgard:

I respectfully submit to you the third annual reports from the Treasurer of State regarding fiscal year 2010 investment activity related to Iowa Code 12F 'Restrictions on Sudan-Related Investments'. Attached are reports for the State Operating Fund, the Iowa Judicial Retirement System, and the Iowa Peace Officers' Retirement, Accident and Disability System.

Respectfully Yours,

A handwritten signature in black ink that reads "Michael L. Fitzgerald". The signature is fluid and cursive, with the first and last names being more prominent.

Michael L. Fitzgerald
Treasurer of State

Cc: Representative Pat Murphy
Speaker

Representative Kevin McCarthy
Majority Leader

Representative Kraig Paulsen
Minority Leader

**Iowa State Operating Fund
Annual Report
On Sudan Divestment
For The Fiscal Year Ended June 30, 2010**

Purpose

This is the third annual report required by Iowa Code Chapter 12F regarding restrictions on Sudan-related investments by the Iowa State Operating Fund (SOF). In response to the ongoing human rights situation in the Darfur region of the country of Sudan, the General Assembly passed SF361, which places restrictions on investments in certain companies that have active business operations there. Effective beginning July 1, 2007, this law intends for state funds not to be invested in companies that provide power production-related services, mineral extraction activities, oil-related activities, or military equipment to the government of Sudan.

Chapter 12F applies to SOF in the following ways:

The system must identify and make available to the public a quarterly updated list of scrutinized companies, which have active or inactive business operations in Sudan. SOF solely uses information published by the Conflict Risk Network to comply with this requirement.

SOF is prohibited from directly investing in scrutinized companies with active business operations listed on the most current quarterly list. The fund is also required to eventually divest from any company with active business operations that were directly held by the fund as of July 1, 2007 after sending written notification to the company.

Any company owned indirectly through a fund is not subject to divestment, but still requires that SOF send written notification. Further, SOF is required to send written correspondence to the investment managers of funds with scrutinized company holdings urging the managers to divest of the scrutinized companies or start a separate fund free of Sudan-related holdings.

Scrutinized Companies List

SOF's final FY 2010 quarterly scrutinized companies list is attached. As of June 30, 2010 SOF does not hold, either directly or indirectly, any companies from the quarterly divestment list.

Written Notices

SOF has not international exposure, and has not held any company on the scrutinized company list at any time, either directly or indirectly. Because of this, no written notices were required.

Divestment

As SOF did not have any direct holdings of scrutinized companies no divestment was required.

Report Availability

This report, along with any other quarterly scrutinized company list can be obtained by contacting the Treasurer's office at 515-281-6878 or kyle.rice@iowa.gov.

Iowa Judicial Retirement System
Annual Report
On Sudan Divestment
For The Fiscal Year Ended June 30, 2010

Purpose

This is the third annual report required by Iowa Code Chapter 12F regarding restrictions on Sudan-related investments by the Iowa Judicial Retirement System (JRS). In response to the ongoing human rights situation in the Darfur region of the country of Sudan, the General Assembly passed SF361, which places restrictions on investments in certain companies that have active business operations there. Effective beginning July 1, 2007, this law intends for state funds not to be invested in companies that provide power production-related services, mineral extraction activities, oil-related activities, or military equipment to the government of Sudan.

Chapter 12F applies to JRS in the following ways:

The system must identify and make available to the public a quarterly updated list of scrutinized companies, which have active or inactive business operations in Sudan. JRS solely uses information published by the Conflict Risk Network to comply with this requirement.

JRS is prohibited from directly investing in scrutinized companies with active business operations listed on the most current quarterly list. The fund is also required to eventually divest from any company with active business operations that were directly held by the fund as of July 1, 2007 after sending written notification to the company.

Any company owned indirectly through a fund is not subject to divestment, but still requires that JRS send written notification. Further, JRS is required to send written correspondence to the investment managers of funds with scrutinized company holdings urging the managers to divest of the scrutinized companies or start a separate fund free of Sudan-related holdings.

Scrutinized Companies List

JRS' final FY 2010 quarterly scrutinized companies list is attached. As of June 30, 2010 JRS does not hold, either directly or indirectly, any companies from the quarterly divestment list.

Written Notices

JRS international exposure is solely in an investment fund. And during the fiscal year no companies on the scrutinized company list were held either directly or indirectly.

Divestment

As JRS did not have any direct holdings of scrutinized companies no divestment was required. Indirect investments do not require divestment.

Report Availability

This report, along with any other quarterly scrutinized company list can be obtained by contacting the Treasurer's office at 515-281-6878 or kyle.rice@iowa.gov.

**Iowa Peace Officers' Retirement, Accident and Disability System
Annual Report
On Sudan Divestment
For The Fiscal Year Ended June 30, 2010**

Purpose

This is the third annual report required by Iowa Code Chapter 12F regarding restrictions on Sudan-related investments by the Iowa Peace Officers' Retirement, Accident and Disability System (PORS). In response to the ongoing human rights situation in the Darfur region of the country of Sudan, the General Assembly passed SF361, which places restrictions on investments in certain companies that have active business operations there. Effective beginning July 1, 2007, this law intends for state funds not to be invested in companies that provide power production-related services, mineral extraction activities, oil-related activities, or military equipment to the government of Sudan.

Chapter 12F applies to PORS in the following ways:

The system must identify and make available to the public a quarterly updated list of scrutinized companies, which have active or inactive business operations in Sudan. PORS solely uses information published by the Conflict Risk Network to comply with this requirement.

PORS is prohibited from directly investing in scrutinized companies with active business operations listed on the most current quarterly list. The fund is also required to eventually divest from any company with active business operations that were directly held by the fund as of July 1, 2007 after sending written notification to the company.

Any company owned indirectly through a fund is not subject to divestment, but still requires that PORS send written notification. Further, PORS is required to send written correspondence to the investment managers of funds with scrutinized company holdings urging the managers to divest of the scrutinized companies or start a separate fund free of Sudan-related holdings.

Scrutinized Companies List

PORS' final FY 2010 quarterly scrutinized companies list is attached. As of June 30, 2010 PORS does not hold, either directly or indirectly, any companies from the quarterly divestment list.

Written Notices

PORS international exposure is solely in a commingled investment fund, and during the fiscal year no companies on the scrutinized company list were held either directly or indirectly.

Divestment

As PORS did not have any direct holdings of scrutinized companies, no divestment was required. Indirect investments do not require divestment.

Report Availability

This report, along with any other quarterly scrutinized company list can be obtained by contacting the Treasurer's office at 515-281-6878 or kyle.rice@iowa.gov.

Sudan Divestment List: Updated as of July 1, 2010

The State Operating Fund has no holdings in any of the listed companies.

For the Public Safety Peace Officers' Retirement, Accident, and Disability System:

None

For the Judicial Retirement System:

None

Companies with active business operations in Sudan:

Company Name – Country of Headquarters

Subsidiaries

Alstom – France

Alstom Power Transformers

Wuhan Boiler Co.

Alstom Projects India

Andritz AG – Austria

Andritz HYDRO

AREF Energy Holdings Company – Kuwait

Higleig Petroleum Services and Investment Co.

Atlas Copco AB – Sweden

Atlas Copco (India) Ltd.

AviChina Industry & Technology Ltd. – China

Jiangxi Hondu Aviation Industry Co. Ltd.

China Acic Avionics Equipment Co. Ltd.

Harbin Dongan Auto Engine Co.

Hafei Aviation Industry Co.

Bharat Electronics Limited – India

Bharat Heavy Electricals Limited - India

China Hydraulic and Hydroelectric Construction Group a.k.a. Sinohydro – China

China National Petroleum Corporation aka CNPC – China

Petrochina Co. Ltd.

Kunlun Energy

Daqing Huake Group Co. Ltd.

Jinan Diesel Engine Co. Ltd.

China Petroleum Engineering Corporation

China North Industries Group Corporation a.k.a. CNGC/NORINCO – China

China North Industries Corporation aka NORINCO

NORINCO International Corporation Ltd

Liaojing Huanjin Tongda

China Petrochemical Corporation a.k.a. Sinopec Group – China

ZPEB Corporation

China International United Petroleum and Chemicals

Sinopec International Petroleum Service Corp

Kingdream PLC

Sinopec Finance Co. Ltd.

China Petroleum and Chemical Corporation a.k.a. Sinopec Corp.

Sinopec Shanghai Petrochemicals Ltd.
Sinopec Kanton Holdings Ltd.
Sinopec Yizheng Chemical Fibre Co. Ltd..
 China Poly Group Corporation – China
Poly (Hong Kong) Investment Limited
 Citadel Capital – Egypt
 Dongfeng Motor Group Co. Ltd – China
 Egyptian Kuwaiti Holding Company – Egypt
Tri-Ocean Energy
 Electricity Generating Company a.k.a. EGCO – Thailand
EGCO Engineering and Service Company, Ltd.
Khanom Electricity Generating Co. Ltd.
 Essar Oil Limited – India
 GAZ Group – Russia
GAZ-Finans
Avtodizel OAO
Pavlovsky Bus Plant
Tverskoy Excavator OJSC
Yaroslavsky Diesel Equipment Plant OAO
 Glencore International AG – Switzerland
Glencore FDG LLC
Glencore Finance
Glencore Finance Europe
 Harbin Power Equipment Limited – China
Harbin Power Engineering (HPE)
 Indian Oil Corporation Limited aka IOCL - India
Lanka IOC
Chennai Petroleum Corporation Limited (CPCL)
Bongaigon Refinery & Petrochemicals Ltd. (BRPL)
 Kamaz – Russia
Neftekamsky Avtozavod aka NEFAZ
 MAN SE – Germany
MAN Diesel
MAN B&W
Renk AG
MAN Financial Service PLC
 Managem – Morocco
Societe Metallurgique D'imiter
ONA S.A.
 Mercator Lines Ltd. – India
Mercator Lines Singapore
 Nippon Oil Corporation – Japan
JX Holdings Inc.
Nippol Oil Finance BV
Nippon Mining
 Oil & Natural Gas Corporation Limited aka ONGC – India
ONGC Videsh Limited aka OVL
ONGC Nile Ganga BV, Amsterdam
Mangalore Refinery and Petrochemicals Ltd. aka MRPL
 Oil India Limited – India
 Petroliam Nasional Berhad aka Petronas – Malaysia

Petronas Carigali Nile
Petronas Marketing Sudan Ltd.
OGP Technical Services
Petronas Gas Bhd
Petronas Dagangan Bhd
Petronas Capital Ltd.
MISC Capital Ltd.
Malaysia International Shipping Company aka MISC Bhd
Midciti Resources Sdn Bhd
KLCC Property Holdings Bhd
Gas District Cooling PutraJaya Sdn Bhd
PTT Public Company Ltd. – Thailand
PTT Exploration & Production PCL
Ranhill Berhad – Malaysia
Ranhill International Inc. aka RII
Ranhill Powertron Sdn
Ranhill Labuan Ltd
Saras S.p.A. – Italy
Scomi Group Berhad – Malaysia
Scomi Oiltools
KMCOB Capital Berhad
Scomi Engineering Berhad
Seadrill Ltd. – Bermuda
Shanghai Electric Group Co. Ltd. – China
Shanghai Power Transmission and Distribution Co. Ltd. aka SPTD
Shanghai Electric Group Finance Co. Ltd.
Shanghai Mechanical and Electrical Industry Co. Ltd.
Trafigura Beheer – Netherlands